

## REMARKS

This response is to the official action mailed on the above-referenced case on June 11, 2007, made final. Claims 19-28 are standing for examination. In the action the Examiner objects to claims 19 and 24. Claims 19-28 are rejected under 35 U.S.C. 112, second paragraph. Claims 19-23 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claims 19-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Linton et al. (US 2004/0015822) hereinafter Linton, in view of Brunner (U.S. 5550971) hereinafter Brunner.

In response applicant herein amends the claims to overcome the claim objections of 112 and the 101 clarify the meaning of certain terms in the independent claims. Applicant further provides arguments which clearly distinguish applicants claimed invention over the combination of Linton and Brunner.

Independent claims 19 and 24 are herein amended to positively claim a component means for arbitrarily grouping model elements includes at least objects, associations and properties and wherein interpreting the semantics at least determine if any of the associations of the ownership of any of the component versions of said configuration are unbound in the configuration.

In applicant's invention the claimed notion of ownership is augmented with associations having a unique set of semantics that simplifies configuration management operations. Applicant argues the unique interpretation of semantics with associations augmented with a notion of ownership makes the present invention unique and non-obvious. The independent claims, as amended, now recite that semantics are interpreted to determine if any of the associations of the ownership of any of the component versions of said configuration are unbound in the configuration.

The inventors of the present invention have discovered that this interpretation prevents incomplete configurations ever coming into existence. Even if one with skill in the art assumes that the general notion of 'ownership' is obvious, the specific

semantics of enforced completeness is clearly not obvious.

Applicant argues that the art of Linton fails to teach the component means, as recited in applicant's claims, as amended. The 'component means' as taught in the present invention is not to be confused with the concept of software components which are units of behavior with interfaces and programmatic implementations, as in the art of Linton. A component in the present invention, is a grouping means that is used for grouping an arbitrary set of model elements.

Applicant points out that although the structure of 'association' being augmented with the property 'ownership' may be conceived as being supported by a meta modeling structure such as the one Brunner describes, such meta-modeling frameworks only support the structural part; semantics have to be implemented in a separate tool that interpret the structure in order to accomplish applicant's invention.

Applicant believes that it is the combination of the claimed semantics that gives to the 'ownership' property which makes applicant's invention unique and non-obvious. The art of Linton and Brunner fails to teach the incorporation of applicant's unique semantics with associations and a notion of ownership.

Therefore, applicant believes independent claims 19 and 24, as amended, are patentable as argued above. Dependent claims 20-23 and 25-28 are patentable on their own merits, or at least as depended from a patentable claim. Applicant respectfully requests re-consideration and the case be quickly passed to issue.

If there are any time extensions required for response in addition to any extension petitioned and paid with this response, such petition is requested, and if there are any fees due over any fees paid with this response, authorization is given to deduct the fees from deposit account 50-0534.

Respectfully submitted,  
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